

DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CALIFORNIA 94704-1204
(510) 665-8644

LAURENCE PARADIS (CA BAR NO. 122336) (lparadis@dralegal.org)
JULIA MARKS (CA BAR No. 300544) (jmarks@dralegal.org)
Disability Rights Advocates
2001 Center Street, Fourth Floor
Berkeley, California 94704-1204
Telephone: (510) 665-8644
Facsimile: (510) 665-8511
TTY: (510) 665-8716

TIMOTHY ELDER (CA BAR NO. 277152) (telder@trelegal.com)
TRE Legal Practice
4226 Castanos Street
Fremont, CA 94536
Telephone: (410) 415-3493
Facsimile: (888) 718-0617

MICHAEL BIEN (CA BAR NO. 96891) (mbien@rbgg.com)
MICHAEL NUNEZ (CA BAR NO. 280535) (mnunez@rbgg.com)
Rosen Bien Galvan & Grunfeld
315 Montgomery Street, Tenth Floor
San Francisco, CA 94104
Phone: (415) 433-6830
Fax: (415) 433-7104

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

NATIONAL FEDERATION OF THE BLIND
OF CALIFORNIA, MICHAEL KELLY,
MICHAEL HINGSON, and MICHAEL
PEDERSEN,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC., RASIER
LLC, and RASIER-CA, LLC,

Defendants.

Case No. 3:14-cv-4086 NC

**JOINT STIPULATION AND ORDER TO
SUBSTITUTE PRIVATE MEDIATION
AND CONTINUE THE CASE
MANAGEMENT CONFERENCE**

Pursuant to Civil Local Rules 6-2 and 7-12, General Order No. 56, and ADR Local Rule 3-4, the undersigned counsel, on behalf of their respective clients, hereby respectfully submit the following stipulation to substitute private ADR for the Court ADR program and to continue the Case Management Conference, in the above-captioned litigation.

The parties held a joint site inspection, and met and conferred regarding potential resolution of the action, on May 8, 2015. The parties have not reached an agreement to resolve this action.

In accordance with General Order No. 56, the matter should be set for mediation. The parties have agreed to use private mediation, and request judicial approval to substitute private mediation for Court ADR, pursuant to ADR Rule 3-4. The parties are in the process of selecting a mutually-agreed-upon mediator and mediation date. It is anticipated that the mediation will be held no later than 60 days from the date of approval of this stipulation and proposed order, which is within the time frame for mediation laid out in General Order No. 56, ¶ 7. In addition, the parties will continue to exchange information necessary to facilitate an effective mediation without undue delay of this matter. Uber will also make certain staff available for further inspection prior to the mediation.

The Case Management Conference is currently scheduled for June 3, 2015, at 10:00am. The parties request that the Case Management Conference be postponed until after the parties engage in mediation. The parties request that the Case Management Conference be scheduled for August 5, 2015, or as soon thereafter as the Court is available, and that the Joint Case Management Statement shall be due 7 days prior to the Case Management Conference.

Thus, the parties agree to and stipulate to the following:

1. The parties will engage in continued informal disclosures and private mediation no later than 60 days from the date of approval of this stipulation and proposed order;
2. The Case Management Conference will be rescheduled to August 5, 2015, or as soon thereafter as the Court is available;

IT IS SO STIPULATED.

By: _____/s/_____
 Andrew M. Spurchise
 Attorneys for Defendants
 UBER TECHNOLOGIES, INC., RASIER LLC,
 AND RASIER-CA LLC

By: _____/s/_____
 Julia Z. Marks
 Attorneys for Plaintiffs
 NATIONAL FEDERATION OF THE BLIND OF
 CALIFORNIA, MICHAEL KELLY, MICHAEL
 HINGSON, AND MICHAEL PEDERSEN

FILER'S ATTESTATION

Pursuant to Civil Local Rule 5-1(i), I, Julia Z. Marks, attest that concurrence in the filing of this document has been obtained.

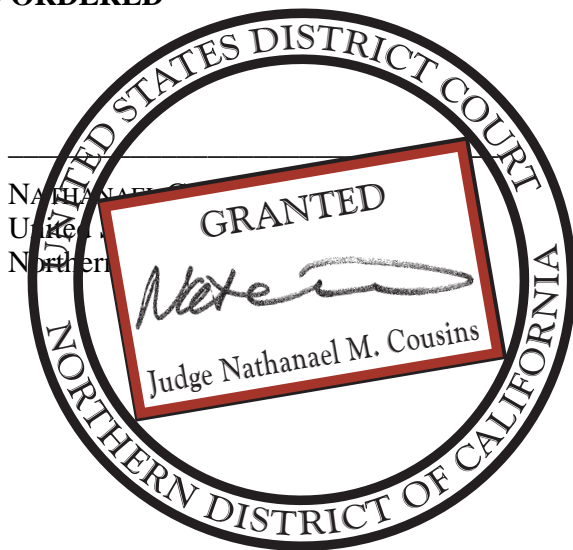
/s/
Julia Z. Marks

DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CALIFORNIA 94704-1204
(510) 665-8644

1 The case management conference is continued to August 5, 2015 at 10:00 a.m. in
2 Courtroom D, 15th Floor, San Francisco. An updated joint case management statement is
3 due 7 days prior to the case management conference.

4
5 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

6 Dated: May 27, 2015



11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CALIFORNIA 94704-1204
(510) 665-8644